

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X DOCKET NO.: 21MC100(AKH)

IN RE: WORLD TRADE CENTER DISASTER SITE
LITIGATION


DECLARATION IN OPPOSITION
TO CITY'S MOTION FOR
MODIFICATION OF SUBPOENA
AND PROTECTIVE ORDER

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DENISE A. RUBIN, an attorney duly licensed to practice before the Courts of the State of New York and a member of the bar of this Honorable Court hereby Declares:

1. I am associated with the law firm Worby Groner Edelman & Napoli Bern, LLP, which firm serves as Plaintiffs' Co-Liaison Counsel in these matters.
2. I respectfully offer this Declaration in Opposition to the City's now pending Motion for Modification of Subpoena and Protective Order.
3. Plaintiffs join in the demands of the sub-contractors for disclosure as defined in their duly-served demands/subpoena(s) and in the motion papers filed on their behalf on the pending motion, adopting such motion arguments and factual statements as if fully set forth herein.
4. Plaintiffs ask this Court to Order that any documents, information, data or other disclosure in any form as sought by the sub-contractors' subpoena(s) and that are the subject of the pending motion by the City of New York for Protective Order is produced to the sub-contractors or to any other party, this Court shall Order that such disclosure shall simultaneously and in like fashion be produced to Plaintiffs via Plaintiffs' Liaison Counsel.

Dated: New York, New York
January 19, 2012


Denise A. Rubin (DR5591)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X DOCKET NO.: 21MC100(AKH)

IN RE: WORLD TRADE CENTER DISASTER SITE CERTIFICATION OF SERVICE
LITIGATION

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DENISE A. RUBIN, an Attorney duly licensed to practice before the Courts of the State of New York and a member of the Bar of this Honorable Court, hereby CERTIFIES that

On January 19, 2012, I duly served a true copy of the within DECLARATION IN PARTIAL OPPOSITION on the persons listed below by e-mail transmission and to all other persons interested in the matter via this Court's ECF filing system.

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